UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JOEL STEPHEN AGEL, on behalf of himself and all others similarly situated, Plaintiffs, v. LINCOLN NATIONAL CORP., and LINCOLN NATIONAL LIFE INSURANCE COMPANY collectively d/b/a LINCOLN FINANCIAL GROUP, Defendants.	Case No. 2:17-cv-01094-GJP

MOTION FOR ADMISSION *PRO HAC VICE* OF ANGELICA M. ORNELAS

David J. Cohen, counsel for Joel Stephen Agel (the "Plaintiff") hereby moves, pursuant to Rule 83.5.2(b) of the Local Rules of Civil Procedure for the United States District Court for the Eastern District of Pennsylvania, for the admission *pro hac vice* of Angelica M. Ornelas, and in support declare as follows:

1. The undersigned is Of Counsel with the firm Stephan Zouras, LLP, and admitted to practice and in good standing before this Court.

2. The undersigned counsel represents the Plaintiff and his appearance has been entered in this matter.

3. The Plaintiff requests representation by Girard Gibbs LLP and Angelica M. Ornelas in this case. Ms. Ornelas's representation will benefit the Plaintiff because of her experience with class actions and complex litigation. The efficient prosecution and administration of this case will be materially advanced by the admission *pro hac vice* of Ms. Ornelas.

4. All counsel have been contacted and there are no objections to this motion.

5. This motion is accompanied by the Declaration of Angelica M. Ornelas in compliance with the Court's current Policies and Procedures.

Dated: March 23, 2017

Respectfully submitted,

STEPHAN ZOURAS, LLP

By: /s/ *David J. Cohen*

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, David J. Cohen, hereby certify that on March 23, 2017, I caused a copy of the Motion for Admission *Pro Hac Vice* of Angelica M. Ornelas to be served upon all counsel of record electronically through the Court's CM/ECF system.

/s/ *David J. Cohen*